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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SYLVIANE D. WHITMORE, and

LARRY MCDANIEL,

Defendants.

Case No. 2:17-cr-00110-APG-CWH

**Stipulation to Continue Deadline for
Government's Response to Defendants' Joint
Motion for New Trial [ECF No. 272]
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, through Richard Anthony Lopez and Mina Chang, Assistant United States Attorneys, counsel for the United States of America, Lisa Rasmussen, counsel for defendant Sylviane D. Whitmore, and Daniel Hill, counsel for defendant Larry A. McDaniel, that:

- (1) The deadline for the Government's Response to defendants' Joint Motion for New Trial (ECF No. 272), currently set for May 16, 2022, be vacated and continued to June 17, 2022; and

1 (2) The deadline for defendants' Replies, currently set for May 31, 2022, be vacated
2 and continued to July 1, 2022.

3 This Stipulation is entered into for the following reasons:

- 4 1. On March 14, 2022, the Court ordered defendants Sylviane D. Whitmore and
5 Larry A. McDaniel to file supplemental briefing on their Motions for New Trial by
6 April 15, 2022, the Government to file its response by May 16, 2022, and
7 defendants to file their replies by May 31, 2022. ECF No. 271.
- 8 2. On April 15, 2022, defendants Whitmore and McDaniel filed their Joint Motion
9 for New Trial and 34 accompanying exhibits. ECF No. 272.
- 10 3. Government counsel needs additional time to complete its research, draft, and
11 finalize an appropriate response to the defendants' motion.
- 12 4. This continuance is not sought for purposes of delay, but to provide the
13 Government the necessary time to file an appropriate response. For the reasons
14 stated above, the

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ends of justice would best be served by a continuance of the deadline.

5. Denial of this request for continuance of the deadline could result in a miscarriage of justice.

6. Defendants Whitmore and McDaniel are out of custody and do not object to the request for continuance.

DATED this 10th day of May, 2022.

Respectfully submitted,

LAW OFFICES OF KRISTINA
WILDEVELD & ASSOCIATES

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Lisa Rasmussen

/s/ Mina Chang

LISA RASMUSSEN
Counsel for Defendant Sylviane D. Whitmore

RICHARD ANTHONY LOPEZ
MINA CHANG
Assistant United States Attorneys

HILL LAW FIRM

/s/ Daniel Hill

DANIEL HILL
Counsel for Defendant Larry A. McDaniel

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 SYLVIANE D. WHITMORE, and

7 LARRY MCDANIEL,

8 Defendants.

Case No. 2:17-cr-00110-APG-CWH

**Order on Stipulation to Continue Deadline for
Government's Response to Defendants' Joint
Motion for New Trial [ECF No. 272]
(First Request)**

9
10 Based on the parties' stipulation to continue the deadline for the Government's
11 Response to defendants' Joint Motion for New Trial, and good cause appearing therefore, the
12 Court hereby finds that:

- 13 1. On March 14, 2022, the Court ordered defendants Sylviane D. Whitmore and Larry
14 A. McDaniel to file supplemental briefing on their Motions for New Trial by April 15,
15 2022, the Government to file its response by May 16, 2022, and defendants to file
16 their replies by May 31, 2022. ECF No. 271.
- 17 2. On April 15, 2022, defendants Whitmore and McDaniel filed their Joint Motion for
18 New Trial and 34 accompanying exhibits. ECF No. 272.
- 19 3. Government counsel needs additional time to complete its research, draft, and finalize
20 an appropriate response to the defendants' motion.
- 21 4. This continuance is not sought for purposes of delay, but to provide the Government
22 the necessary time to file an appropriate response.
- 23 5. The parties agree to this continuance.
- 24

ORDER

IT IS HEREBY ORDERED that the deadline for the Government’s Response to defendants’ Joint Motion for New Trial¹, currently set for May 16, 2022, be vacated and continued to June 17, 2022; and

IT IS SO ORDERED this 11th day of May, 2022.

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